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8 Attorneys for Plaintiff
9 ELAINE WITHROW

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 ELAINE WITHROW, an individual;

13 Case No. 2:15-cv-01573-GMN-(GWF)

14 Plaintiff,

15 THE PARTIES' STIPULATION
16 AND PROPOSED ORDER
17 EXTENDING THE BRIEFING SCHEDULE, and
18 CONTINUING THE OCTOBER 1, 2015
19 HEARING DATE ON DEFENDANTS'
20 MOTION TO TRANSFER VENUE
(Docket No. 6)

vs.

21 CAMDEN DEVELOPMENT, INC., a Delaware
22 corporation; CAMDEN PROPERTY TRUST, a
23 foreign real estate investment trust; H.
24 MALCOLM STEWART, in his capacity as
25 trustee or fiduciary of the CAMDEN
"KEYSOP", an I.R.S. Section 409(A)
compensation plan; DOES 1 through 5,
inclusive; and ROE corporations 1 through
5, inclusive,

Defendants.

The parties, by the undersigned counsel, hereby stipulate and agree to extend the briefing schedule and ask the Court to continue the hearing date on Defendants' Motion to Transfer Venue (Docket No. 6) as follows:

Plaintiff's Opposition to Defendants' Motion shall now be due on or before Thursday, September 24, 2015;

Defendants' Reply in support of their Motion shall be due on October 8, 2015, fourteen (14) days after the service of Plaintiff's filed Opposition.

Defendants' Motion has been set for hearing on Thursday, October 1, 2015 at 11:00 a.m. (Docket No. 7) The parties hereby request that the Court reset the hearing on

1 Defendants' Motion for the first available date for hearing after the Motion is fully briefed. The
2 parties believe that the matter of Defendants' Motion to Transfer Venue will be fully briefed and
3 ready for hearing not earlier than Monday, October 12, 2015.

4 This stipulation is made in good faith to allow all parties to fully complete due diligence,
5 brief the matter and prepare for the hearing, and is not merely for delay.

6 Dated: Thursday, August 27, 2015.

7 LAW OFFICES OF STEVEN J. PARSONS

8 /s/ Steven J. Parsons
9 STEVEN J. PARSONS
Nevada Bar No. 363

JACKSON LEWIS P.C.


ELAYNA J. YOUCAH
Nevada Bar No. 5837

10 Attorneys for Plaintiff
11 ELAINE WITHROW

12 Attorney for Defendants
13 CAMDEN DEVELOPMENT, INC.;
CAMDEN PROPERTY TRUST;
H. MALCOLM STEWART, in his capacity as
trustee or fiduciary of the CAMDEN "KEYSOP"

14 ORDER

15 IT IS HEREBY ORDERED that Plaintiff's Opposition to Defendants' Motion to Transfer
Venue shall be due on or before Thursday, September 24, 2015.

16 IT IS FURTHER ORDERED that Defendants' Reply in Support of their Motion to Transfer
17 Venue shall be due on or before October 8, 2015, which is fourteen (14) days after the filing
18 of Plaintiff's Opposition to Defendants' Motion.

19 IT IS FURTHER ORDERED that the hearing on Defendants' Motion to Transfer Venue
20 is continued from Thursday, October 1, 2015 at 11:00 a.m. to Friday, October 16,
21 2015 at 9:30 a.m./p.m.

22 Dated: August 28, 2015.


GEORGE FOLEY, JR.
United States Magistrate Judge

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